EXHIBIT 1: INSTRUCTIONS FOR PRODUCTION OF
ELECTRONICALLY STORED INFORMATION

1.   Except as indicated below in Paragraph 8, which pertains only to excel spreadsheets, all documents should be produced in Tagged Image File Format ("TIFF") on CD/DVD or portable hard drive. All TIFF images should be single-page TIFF images with a .LFP image load file that will permit review with programs such as IPRO. TIFF image naming should be limited to alphanumeric names only, with no spaces, no hyphens, and no special characters, such as ^,;' etc., in the file name.

2.   The .LFP image load file should designate proper attachment unitization that aligns with the database document and attachment ranges. This unitization should be accomplished by using the level "C" for attachments. An example of a line designating an attachment in the .LFP file is as follows:

    IM,GME00000001,C,0,@CDNAME;IMAGEPATH;GME00000001.TIF;2;

3.   The unitization levels you should use are set out below:

    Source

    Box

    Folder

    Document

    Child

    If you currently use unitization beyond the Parent and Attachment level, you should provide those levels in a format consistent with the document levels above.

4.   All documents should have Optical Character Recognition ("OCR") provided. The OCR and database information should be combined and produced in a .DAT file format, which can be loaded directly into a Concordance database. All import delimiters for the Concordance .DAT file should be set for the Concordance automatic defaults, as found using the Concordance Import Wizard.

5.   Any database fielded information should be produced in the order listed below:

    1 BEGNUM   Paragraph 16
    2 ENDNUM   Paragraph 16
    3 PAGES   Numeric (integer)
    4 BEGATTACH   Paragraph 16
    5 ENDATTACH   Paragraph 16
    6 ATTACH   Paragraph 16
    7 ATTACHMENT Paragraph 16

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8 DOCTYPE   Paragraph 16
9 DOCDATE   Date   MM/DD/YYYY
10 DOCTITLE   Paragraph 16
11 AUTHOR   Paragraph 16
12 TO   Paragraph 16
13 FROM   Paragraph 16
14 CC   Paragraph 16
15 BCC   Paragraph 16
16 SUBJECT   Text   30
17 EMAILSUBJECT Text   30
18 TIMECREATED Text   60
19 TIMELASTMOD Text   60
20 DATECREATED Date   MM/DD/YYYY
21 DATELASTMOD Date   MM/DD/YYYY
22 TIMERECVD   Text   60
23 TIMESENT   Text   60
24 DATERECVD   Date   MM/DD/YYYY
25 DATESENT   Date   MM/DD/YYYY
26 BOXNUM   Text   25
27 BOXBEGSTART Text   25
28 BOXBEGEND   Text   25
29 BOXSOURCE   Paragraph 16
30 PRTFOLDSTART Text   25
31 PRTFOLDEND   Text   25
32 CHILDFLDSTRT Text   25
33 CHILDFLDEND Text   25
34 CDVOL   Text   25
35 CUSTODIAN   Paragraph 16
36 FILEDESCRIPT Paragraph 16
37 FILENAME   Text   30
38 FOLDER   Paragraph 16
39 FILESIZE   Text   10
40 FILETYPE   Text   30
41 DOCEXTENSION Text   10
42 RECORDTYPE   Text   30
43 UNREAD   Text   10
44 READRECPT   Text   10
45 DELRECIPT   Text   10
46 OCR   Paragraph 16

6.   All document ID numbers or Bates numbers should be formatted in the following way: 3 alphabetical characters followed by 8 numeric digits (e.g., GME00000001). No spaces or hyphens should be included between the alpha prefix and the numeric suffix; and

7.   All parent-child relationships should be designated using the Begattach and Endattach fields within the database load file. The Begattach field should contain the parent

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document's beginning number. The Endattach field should contain the last number of the entire attachment range. For example, assume an email designated GME00000001-GME00000002 has a 3-page Word attachment, which is designated GME00000003-GME00000005. The Begattach number should be GME00000001 for both documents. The Endattach number should be GME00000005 for both documents.

8.   Excel spreadsheets should be produced in native electronic format in such manner that will enable database linking to the native file. The fielded database load file should contain a field (such as DOCLINK or ATTACHMENT) that sets forth the file path link to the location of the Excel spreadsheets in any sub-folders included in the production. The Excel spreadsheets should be named with the production number as the full or first part of the file name. An example of a file name beginning with the production number is as follows: GME00000001^Excel Spreadsheet Name.xls. It is acceptable to name the Excel spreadsheet with the production number only.